

**REMARKS**

Applicants have carefully studied the non-final Office Action issued December 20, 2000, in the above-titled matter and the applied and cited prior art references. This paper is responsive thereto.

The Examiner has rejected claims 22 and 23 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to point out and distinctly claim the subject matter which applicants regard as the invention. Further, the Examiner has rejected claims 1-13, 16-18, and 22-24 under 35 U.S.C. 103(a) as being unpatentable over Kugimiya et al. (U.S. 5,005,127, hereinafter Kugimiya) in view of Maruyama et al. (U.S. 5,640,575, hereinafter Maruyama) and Motoyama (5,848,386, hereinafter Motoyama) in view of Maruyama. Finally, the Examiner has rejected claims 1, 17, 18, and 24 under 35 U.S.C. 102(b) as being anticipated by Caterpillar (WO 94/06086, hereinafter Caterpillar).

Applicants have amended the title to address the Examiner's first allegation that the title is not descriptive.

**Claim Objection**

The Examiner has objected to claim 24 based on the use of the term "calculating." Applicants respectfully submit that claim 24 is properly drafted using the term "calculating."

**Claim Rejections under 35 U.S.C. 112, Second Paragraph**

The Examiner continues and rejects claims 22 and 23 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. In response, Applicants have amended claims 22 and 23 to overcome the allegation of a lack of antecedent basis.

**Claim Rejections under 35 U.S.C. § 103(a)**

The Examiner continues and rejects claims 1-13, 16-18, and 22-24 under 35 U.S.C. 103(a) over Kugimiya in view of Maruyama.

As per claims 1, 17, 18, and 24, the Examiner states, "It is noted that Kugimiya et al do not teach explicitly teach the step of converting at least a portion of the source placeable element into a target placeable element." Kugiyima teaches the use of no-conversion markers to bypass the conversion process for anything within a start marker and an end marker and simply output the source text into the target text *unchanged*. (Col. 6, lines 1-4). Kugiyima simply extracts text from the source and places it in the target unchanged, unaltered, and unmodified. The Examiner continues however to state,

one of ordinary skill in the art at the time the invention was made would have found it obvious to incorporate into Kugiyima the variable translation pattern as taught by Maruyama et al because it would provide patterns for machine translation that can easily be created and efficiently retrieved by a user and can generate a translation sentence based on these patterns (see col.1, line 58-64).

Maruyama does teach a "translation pattern comprising a first source language pattern, a variable that replaces this first source language pattern with one character, and a target language pattern that is a translation sentence corresponding to the first source language pattern." (Col. 2, lines 1-5). Maruyama teaches comparing "a text sentences to one or more nested source language pattern to determine if there is a match between the text sentence and the nested or the singular source language patterns." (Abstract). Therefore, for example, under Maruyama, an entry of 120 kph *would not be converted* into an equivalent measurement of velocity expressed in mph. Nor would a currency entry of £57.23 be converted into an equivalent monetary value expressed in U.S. dollars (\$). Maruyama does not teach or suggest the identification of source placeable elements and conversion into target placeable elements. As Kugiyima also fails to teach or suggest this recitation, Applicants submit that the combination of the two references fails to teach or suggest all recitations in the claims. Accordingly, at least claim 1 is allowable over the combination of Kugiyima and Maruyama. See MPEP §§2142 and 2143.

Claims 2-13, and 16 are believed allowable for at least the reasons set forth with respect to claim 1. Claim 24 is also allowable for at least these reasons.

As per claims 22 and 23, the Examiner states "Maruyama et al teach a method for processing a source information wherein the step of converting for converting a source currency into a target currency and mathematical calculations is automatic (figures 2 and 6)." However, the descriptions of Figures 2 and 6 of Maruyama teach a translation, but not a change, for example, in the character, or mathematical computation.

A translation pattern 18 comprises a tuple of three items <original language pattern 18A, variable 18B, target language pattern 18C>...For example, a translation pattern <.,about.,patent> indicates that the character string, "" is translated into the character string, "patent". In addition, it indicates that the string "" can be identified with the one-character variable ".about." when "it" appears as part of a longer character string. (Col. 3, lines 33-41)

Maruyama teaches the use of the translation pattern to translate. However, there is no information disclosed within Maruyama or any other prior art reference that teaches a method for processing a source information where the step of converting a portion of the source placeable element requires a calculation for converting a source currency into a target currency. Maruyama teaches nothing more than a substitution of one term (or symbol) for another. So, for example, the symbol (or character string) for Japanese Yen would be replaced by the term "yen." The combination fails to teach or suggest the converting a "source placeable element" as claimed as there is no converting taught in the combination of Kugimiya and Maruyama.

The Examiner rejects claims 1-13, 16-18, and 22-23 under 35 U.S.C. 103(a) over Motoyama in view of Maruyama.

As per claims 1, 17, and 18, the Examiner, as with Kugiyima before, outright states, "It is noted that Motoyama does not explicitly teach the step of converting at least a portion of the source placeable element into a target placeable element." Motoyama teaches the use of a source-to-target/target-to-source dictionary as shown in Fig. 4. "The original document which is to be translated contains information indicating the dictionary or translation rules which are to be utilized for the translation. The information contained within the document used to indicate different sections is encoded using Standard Generalized Markup Language (SGML) tags." (Abstract). As with

Kugiyima and Maruyama, the tagged information is not subjected to any change. These “tagged” sections of information tell the computer to use a different dictionary, dictionary rule, etc. on the following information. Motoyama teaches nothing of “converting at least a portion of said source placeable element into a target placeable element.” Motoyama has no bearing since the allegedly correlating function within Motoyama “tags” information in order to specify the desired dictionary, dictionary rules, etc., for the following text. The Examiner continues however to state,

one of ordinary skill in the art at the time the invention was made would have found it obvious to incorporate into Motoyama the variable translation pattern as taught by Maruyama et al because it would provide patterns for machine translation that can easily be created and efficiently retrieved by a user and can generate a translation sentence based on these patterns (see col.1, line 58-64).

Maruyama teaches comparing “a text sentences to one or more nested source language pattern to determine if there is a match between the text sentence and the nested or the singular source language patterns.” (Abstract). Therefore, for example, under Maruyama, an entry of 120 kph *would not be converted* into an equivalent measurement of velocity expressed in mph. Nor would a currency entry of £57.23 be converted into an equivalent monetary value expressed in U.S. dollars (\$). Maruyama fails to teach or suggest the recitations missing from Motoyama. Accordingly, claim 1 is allowable over the combination.

Claims 2-13 and 16-18 are allowable at least for these reasons.

Claims 22 and 23 are allowable for similar reasons as applied above.

#### **Claim Rejections under 35 U.S.C. 102(b)**

The Examiner rejects claims 1, 17, 18, and 24 under 35 U.S.C. 102(b) as being anticipated by Caterpillar. Applicants traverse.

Caterpillar discloses a translation system that forces an author to conform authored text to a constrained text. Caterpillar fails to disclose all elements of the independent claims.

For example, claim 1 recites:

“converting at least a portion of said source placeable element into a target placeable element.”


While Caterpillar discloses “assisting in translating currencies and mathematical units through the identification of specific types of text that require special treatment,” it fails to disclose the converting step. Caterpillar repeatedly uses an author to recursively correct the text of a document to fit nicely into an interlingua format. However, there is no disclosure that Caterpillar converts a “source placeable element into a target placeable element.” The language cited to by the Examiner fails to indicate that Caterpillar converts any elements. Rather, the language of page 17 appears to disclose that text needing some type of further treatment is present in the text and needs to be addressed. Pages 44, 45 and 58 disclose in greater detail the identification and presentation for the author to correct the document.

Applicants respectfully request reconsideration of the original claims and the amended claims and looks forward to passage to issue of the present application at the earliest convenience of the Office. In the event the Examiner wishes to contact applicants' representative for any reason, the Examiner should not hesitate to contact the undersigned at the number indicated below.

Respectfully submitted,

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APPENDIX 1

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Title

The title has been replaced by:

Method And Apparatus For Processing Source Information Based On Source Placeable Elements

In The Claims

1. (Amended) A method for processing source information comprising the steps of:

parsing input source information into elements;

identifying a source placeable element by predetermined criteria; and

converting at least a portion of said [the] source placeable element into a target placeable element.

22. (Amended) A method for processing source information according to claim 1, wherein [the step of] converting [calculations] at least a portion of said source placeable element includes a calculation for converting a source currency into a target currency, said calculation for converting is automatic.

23. (Twice Amended) A method for processing source information according to claim 1, wherein [the step of] converting [mathematical calculations] at least a portion of said source placeable element includes a mathematical calculation, said mathematical calculation [are] is automatic.

24. (Amended) A method for processing source information comprising the steps of:

parsing input source information into elements;

identifying a source placeable element by predetermined criteria; and

calculating at least a portion of [the] said source placeable element into a target placeable element.